

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARLIN M. ADAMS, <i>Chapter 11 Trustee of</i>)	
<i>the Post-Confirmation Bankruptcy Estates of</i>)	
<i>CORAM HEALTHCARE CORP. and CORAM,</i>)	
<i>INC.,</i>)	
)	Civ. Action No. 04-cv-1565(SLR)
Plaintiff,)	
v.)	
)	
DANIEL D. CROWLEY, <i>et al.</i> ,)	
)	
Defendants.)	
)	

MOTION FOR PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiff, Arlin M. Adams, Chapter 11 Trustee of the Post-Confirmation Bankruptcy Estates of Coram Healthcare Corporation and Coram, Inc., and Wilbur L. Kipnes and Barry E. Bressler, both trial counsel for Plaintiff, by their undersigned attorneys and for the reasons set forth in the brief that accompanies this motion, hereby move for a protective order to prohibit Defendant Daniel D. Crowley from deposing Plaintiff's trial counsel (Mr. Kipnes and Mr. Bressler) in this litigation.

Dated: April 13, 2007

/s/ Michael J. Barrie
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